The Honorable Brian D. Lynch
Chapter 11
Hearing Date: January 27, 2011
Hearing Time: 1:00 PM
Hearing Location: Tacoma, WA

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON, AT TACOMA

In re: HAWKS PRAIRIE INVESTMENT, LLC, Debtor.	**No. 10-46635-BDL** **DEBTOR'S REPLY IN SUPPORT OF WITHDRAWAL OF DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION**

Hawks Prairie Investment, LLC (the "Debtor"), by and through counsel, HACKER & WILLIG, INC., P.S., respectfully submit this Reply in Support of Notice of Withdrawal of Debtor's Disclosure Statement and Plan of Reorganization.

By way of brief background, a voluntary petition under Chapter 11 of the Bankruptcy Code was filed on or about August 13, 2010, with the Debtor's prior counsel appointed on or about September 27, 2010 pursuant to 11 U.S.C. § 1102 of the Bankruptcy Code. Then, on or about December 21, 2010, outside of the context of this proceeding, HACKER & WILLIG, INC., P.S. conducted a public sale of all the limited liability company units of the Debtor. Consequently, J. Scott Griffin, Jr. and Freestone, Inc. (collectively, "Griffin") assumed all ownership interests in, and management control of, Pacific Investment Group, Inc., Hawks Prairie Investment, LLC, and

GBS II Investment, LLC. As of January 10, 2011, HACKER & WILLIG, INC., P.S. substituted in as counsel for the Debtor.

All of which is to say that the Debtor has recently undergone significant change with respect to its ownership and control. This should come as no surprise to the objecting party, HomeStreet Bank ("HomeStreet"), who was well aware that Griffin was going to take almost immediate control of the Debtor at the time the original Reorganization Plan was filed. Therefore, though prior Orders have been entered by this Court regarding this Debtor, none of which the Debtor unilaterally intends to violate, the Debtor seeks additional time to make obvious amendments to the Plan and Disclosure Statement.

Notably, the only objection to the requested brief delay is by HomeStreet, which argues primarily that the Settlement Agreement reached in this case, to which Griffin previously objected, should continue in effect. While the Debtor does not necessarily disagree with this position, the recent, dramatic change in the Debtor's managerial composition cannot be ignored. Further, under the guise of protecting the integrity of a Court order, a single creditor should not be permitted to force through its own narrow agenda to the detriment of the estate.

Therefore, for all the foregoing reasons, the Debtor respectfully requests that the Court permit withdrawal of the Disclosure Statement and Plan to allow the Debtor to file an Amended Plan and Disclosure Statement by Friday, February 4, 2011.

DATED this 24th day of January, 2011.

Respectfully submitted,

HACKER & WILLIG, INC., P.S.

*_/s/ Arnold M. Willig_*
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